

**2****DON J. POOL, SBN 166468****FENNEMORE DOWLING AARON**

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[dpool@fennemorelaw.com](mailto:dpool@fennemorelaw.com)Attorneys for ABLP PROPERTIES VISALIA, LLC,  
a Delaware limited liability company**UNITED STATES BANKRUPTCY COURT****EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION**

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In re

ESPERANZA HANSEN GONZALEZ,

Debtor.

Case No.: 21-11034-A-7

Chapter 7

Adv. Proc. No.: 21-01031-A-7

ABLP PROPERTIES VISALIA, LLC, a  
Delaware limited liability company,

Plaintiff,

vs.

ESPERANZA HANSEN GONZALEZ,

Defendant.

**PLAINTIFF'S STATUS CONFERENCE  
STATEMENT AND REQUEST FOR  
DISMISSAL**

Date: June 2, 2022

Time: 11:00 AM

Place: U.S. Bankruptcy Court  
2500 Tulare Street  
Courtroom 11, Department A  
Fresno, CA 93721

Judge: Hon. Jennifer E. Niemann

As the Court will recall, there was a pending, related action brought by the Debtor's wholly owned entities, Debtor ESPERANZA HANSEN GONZALEZ ("Defendant" or "Debtor"), and Debtor's spouse against ABLP PROPERTIES VISALIA, LLC ("ABLP"), a related entity and two individuals in the Tulare County Superior Court (the "State Court Litigation"). The State Court Litigation was set previously set for trial on June 27, 2022.

In the main bankruptcy case in this matter, Plaintiff and related ABLP parties

1 entered into a settlement agreement with the Chapter 7 Trustee, James Salven, that was ultimately  
2 approved by the Court by Order entered on June 8, 2022. Pursuant to the Settlement, the Trustee  
3 dismissed the Complaint with prejudice and stipulated to entry of Judgment against both Magnolia  
4 entities in the State Court Litigation. All that remains to be completed under the Settlement is the  
5 dissolution of the Magnolia entities.

6 In light of the resolution of the State Court Action, Plaintiff ABLP requests, pursuant  
7 to Federal Rule of Bankruptcy Procedure 7041, that the Court dismiss the Complaint for  
8 Nondischargeability and this Action, in its entirety, at the Status Conference, and grant such other  
9 and further relief as the Court may deem just and proper.

10 Dated: July 7, 2022

FENNEMORE DOWLING AARON, LLP

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12 By: /s/ Don J. Pool

13 Don J. Pool, Attorneys for ABLP  
14 PROPERTIES VISALIA, LLC, a  
15 Delaware limited liability company  
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